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cc:
Subject: Airport Draft EIR

<?xml:namespace prefix = o ns = "urn:schemas-microsoft-com:office:office" />
Dear Ms. Reynolds
Thank you for the opportunity to provide a response to the Draft EIR.
Below are my comments to the Draft Environmental Impact Report for the Long Beach Airport Area Terminal Improvement Project.

I am particularly alarmed by the Draft EIR's conclusion that the proposed project of a 103,000 square foot Terminal Building "is the environmentally superior alternative." According to USGBC LEED criteria which is supposed to be a guiding principal for this project, the larger a building is, the more it materials it requires to build, the more energy it requires to light, the more energy it requires to air condition, the more energy it requires to heat, more chemicals it requires to maintain, and it creates more heat source in an urban landscape. Furthermore the larger alternative relies on the development presently undeveloped of Parcel "O" which is now open space and permeable land. According to LEED principals, the larger building would be the **environmentally inferior alternative**. 1

Most people would agree that building a parking structure to accommodate passengers driving single accompany vehicles to and from the airport is also an **environmentally inferior alternative.** 2

HNTB's 2004 study recommending an even larger terminal building shows bias. City Council approved a smaller size option because HNTB conclusions ignored the voices of hundreds of hours of testimony of residents who oppose airport expansion. For purposes of this study, the City Council voted to study a stated project - nothing more. If the EIR discusses HNTB's recommendations at all, it must also cite all the public testimony that HNTB ignored because airport management was paying for the study. 3

Noise evaluations in this Draft report are very problematic. The public has just recently learned that the noise calculation disregard the nigh level of noise when a jet is taking off and landing, when wheels are on the ground. Full public disclosure requires that ALL the airport noise, noise that the surrounding community is exposed to, must be disclosed. This includes ALL the noise from life-flight, military and any other aviation noise that may be disregarded in the budgets for the Noise Ordinance. Policy makers and the public must have a comprehensive data of all the noise exposure. The noise contours must show all the present and expected noise impacts. 4

It is unacceptable that the Draft EIR failed to include air quality data of actual air sampling taken at, near and around the airport property. In public scoping meetings, there was an overwhelming public demand for actual air sampling, The only existing air collection point is many blocks 5

upwind of the airport. When a jet runs up it engines at take off, jet exhaust levels are very high and are blown into residential neighborhoods. A single collection point upwind of the runway is unacceptable to evaluate this pollution. Residents demand to know the cumulative negative impact associated with the ports pollution and the 710 corridor for the movement of goods, must be considered so the public knows the health risk.
The evaluation of emissions form aircraft still using lead-based additives in aviation fuel. must be conducted. Lead exposure is very hazardous to humans.

5 cont.

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3.2 RESPONSES TO INDIVIDUAL COMMENT LETTERS

COMMENTER 286 SARAH ROBBINS
Dated: January 30, 2006

Response 1

There is a commitment to construct the new facilities to meet high standards for energy efficiency and environmental design. The intention is to construct the facilities consistent with the LEED standards. LEED, which stands for Leadership in Energy and Environmental Design is 'based on well-founded scientific standards, LEED standards emphasizes state of the art strategies for sustainable site development, water savings, energy efficiency, materials selection and indoor environmental quality. LEED standards recognizes achievements and promotes expertise in green building through a comprehensive system offering project certification, professional accreditation, training and practical resources.' (U.S. Green Building Council, http://www.usgbc.org). This would be implemented through a variety of design features. Precise methods for accomplishing the LEED standards would be determined through project design.

It is recognized that construction of facilities in excess of what is required to serve the demand would not be efficient; however, it is also necessary to provide sufficient facilities to serve the demand. Construction of terminal improvements that would not serve the demand and necessitate other improvements or use of temporary modular buildings, similar to existing conditions, would not be environmentally superior. As indicated in the Draft EIR (page 1-25),

> …based on the *Facility Requirements Analysis, Long Beach Municipal Airport*[71] study which was prepared during the scoping process, the recommended sizes of the facilities to best meet the needs for the passengers, visitors, and tenants actually exceeded the square footage allocation of even the Proposed Project.

Refer to Topical Response 3.1.4 regarding the environmentally superior alternative.

Response 2

The number of parking spaces required was calculated from a professional parking study entitled "Long Beach Airport Parking Adequacy Analysis", which was conducted for the City in 2001. The study showed a need for 2.75 parking spaces for each 1,000 annual enplanements. Currently, during peak travel periods the existing parking structure at the Airport is full. This results in vehicles driving around looking for parking and needing to go out to the remote lot (Lot D). If sufficient parking were not provided, there would be an increase in the number of passenger drop-off and pick-up trips because some of the passengers would have no other option but to be dropped off, increasing the overall amount of traffic at the airport. In addition to increasing the overall amount of traffic at the Airport, this would also result in greater air quality impacts. Therefore, the DEIR's conclusion that additional parking is an integral part of the environmentally superior alternative is accurate.

Response 3

All of the public testimony that was given at the public meeting on November 29, December 3, December 5, and December 15, 2005 is provided in the Responses to Comments document dated April 24, 2006. These meetings, which were held after the release of the Draft EIR,

[71] HNTB 2004.

constitute all of the official public meetings on the Draft EIR. It should be noted that after the original Notice of Preparation for the proposed project was released, the Airport Advisory Commission (AAC) held a series of 15 public meetings between November 2003 and July 2004 at which the proposed project was discussed. Though not part of the formal scoping process, the AAC used these meetings to consider the public's recommendations regarding possible Airport improvements. The AAC's recommendations were then forwarded to the City Council which, on February 8, 2005, directed the DEIR consultant team not to carry forward the AACs recommended facility size (133,000 square feet), opting instead for a smaller (102,850 square feet) proposed project. Each of the project alternatives that is evaluated in the DEIR is smaller than the proposed project.

Response 4

Refer to Topical Response 3.1.6, Nighttime Noise Violation Review Process, regarding the types of operations that are, by federal law, exempted from complying with the City's noise limits/curfew.

Response 5

Please see Topical Response 3.1.5, Methodology for the Air Quality Impact Analysis and Human Health Risk Assessment, regarding air sampling data near the Airport.

Regarding lead emissions, the emissions inventory does include lead emissions from piston-driven aircraft fueled on leaded aviation gasoline, as noted in the Draft EIR, Appendix C, Section 3.1.1.4. Lead emissions are summarized in Table 3-8 of Appendix C. Concentrations of lead are included in the Draft EIR, Section 3.2, Tables 3.2-13, 3.2-17, and 3.2-20. These lead concentrations do not exceed any significance thresholds or ambient air quality standards.

Quantitative analysis of any cumulative impacts of future projects at the Ports of LA and Long Beach and the 710 Freeway expansion are beyond the scope of this Draft EIR. The City has no way of knowing if and when such projects will be undertaken and what the timing and scope of the projects, if approved, might be. Any such projects conducted in the future would be subject to CEQA and would have to account for cumulative impacts, including those associated with airport improvement. Only at such time would sufficient information be available to assess potential cumulative health risks.